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June 10, 1992

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Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

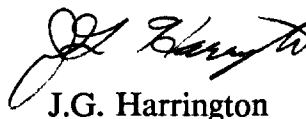
Re: The Use of N11 Codes and Other Abbreviated Dialing
Arrangements
CC Docket No. 92-105

Dear Ms. Searcy:

Attached please find a letter from the undersigned to Michael S. Slomin, Senior Attorney, Bell Communications Research. On behalf of our client, Cox Enterprises, Inc., I hereby request that you associate this letter with the above-referenced docket.

Please inform me if any questions should arise in regard to this request.

Respectfully submitted,


J.G. Harrington

JGH:vad
Attachment
cc: Peyton L. Wynns

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VIA FEDERAL EXPRESS

Michael S. Slomin, Esquire
Senior Attorney
Bell Communications Research
290 West Mt. Pleasant Avenue
Room LCC-2B336
Livingston, New Jersey 07039

Re: N11

Dear Mr. Slomin:

I was disappointed yesterday when you informed me that you had instructed certain Bellcore personnel not to speak to representatives of Cox Enterprises about the issues regarding the assignment of N11 codes. I do not believe that this approach is productive, either in this particular situation or in the broader context of Bellcore's administration of the North American Numbering Plan. Consequently, I urge you to reconsider this restriction on conversations with Cox's representatives.

The conversations I have had with Bellcore representatives have been extremely useful in explaining how Bellcore administers the numbering plan, what issues might arise in connection with the potential uses of N11 codes and how to approach the assignment of N11 codes for local use. We viewed Bellcore as a public resource, indeed the only resource, for the information that we needed. We have taken extreme care when we use information from those conversations to assure that our statements reflect an accurate understanding of what Bellcore personnel have told us, and have refrained from using information when we have any doubt about the meaning of what was said. We have acted in good faith and with the intention of better defining the issues in the N11 matter so that an informed decision can be reached. Your instructions could hinder our efforts to find an approach to this matter that accounts for the interests of all parties. Your instructions also deliver a clear and ominous message: Those parties with opinions about the assignment of N11 codes or about other numbering issues that may differ from those of Bellcore face retaliation for their views. That is a matter that will be of profound interest to federal and state regulators.

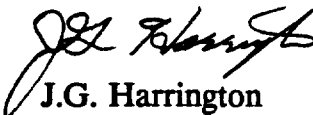
Michael S. Slomin, Esquire
June 10, 1992
Page 2

I also am concerned that your instructions may restrict the free flow of information in other areas. Cox is participating in the consideration of both the assignment criteria for NXX codes and the NANP Administrator's Proposal on the Future of Numbering in World Zone 1. While you informed me that Bellcore personnel would speak to us regarding these matters, I believe that your instructions will make them less likely to disclose information that they might otherwise make available, especially if it has any potential influence on the N11 matter. This could be a particular problem in the Future of Numbering matter, because Bellcore initially suggested that N11 codes might be assigned as service access codes after 1995.

Bellcore portrays itself in its FCC filings and elsewhere as a public service organization, especially in its role as Administrator of the North American Numbering Plan. Restricting the freedom of Bellcore employees responsible for the numbering plan to discuss numbering matters does not just impede rational decision-making on these issues. It also reinforces the doubts of those concerned that Bellcore is not a neutral administrator, but rather favors the interests of its owners, the Bell Operating Companies.

Please inform me if you have any questions in connection with this letter.

Sincerely,



J.G. Harrington

JGH:vad
cc:

Hon. Alfred C. Sikes
Hon. James C. Quello
Hon. Sherrie P. Marshall
Hon. Andrew C. Barrett
Hon. Ervin S. Duggan
CC Docket 92-105 (N11)
Docket of DA 91-1307 (Numbering Issues)